

CC Docket Number: 02-6  
Applicant Name: Hackley Public Library  
Billed Entity Number: 131547  
Form 471 Number: 838141  
FRN Number: 2321499  
Appeal Prepared By: Michon Wiesen, USF Consultant  
Phone Number: 800-705-9703  
CRN Number: 16043589  
E-mail: michon@elitefund.com  
Date: May 19, 2015

Received & Inspected  
MAY 22 2015  
FCC Mail Room

DOCKET FILE COPY ORIGINAL

Request for Review or Waiver; requesting review of a decision of the Universal Service Administrative Company (Administrator). This request comes before the Commission in a timely manner from the Administrator decision dated April 27, 2015. **(Enclosure E)** The FCC denial letter still does not clarify what it considers minimal charges for insider wire maintenance under the Priority 1 ESL for 2012. It only states that it is not and should be moved to Priority 2 service. Please note that the Hackley Library maintains that this is a minimal charge but if the commission would show documentation of what dollar amount per month per line is minimal they would be happy to pay back USAC the difference. The reviewer who initially submitted the request was unwilling to answer that question for Hackley Library and in Attachment E the denial of appeal still does not state in dollars what they consider "minimal" per line costs.

This letter is an appeal for the 2012 Improperly Disbursed Funds Recovery Letter for SPIN 143004791, FRN 2321499. The library received an Improperly Disbursed Funds Recovery Letter on January 2, 2015 saying that it was determined that \$424.36 in funds was improperly disbursed for the following ineligible items: Inside Wire Maintenance (see attached Recovery letter – **Attachment A & D**).

Per the 2012 Eligible Services List at [http://www.usac.org/res/documents/sl/pdf/ESL\\_archive/EligibleServicesList-2012.pdf](http://www.usac.org/res/documents/sl/pdf/ESL_archive/EligibleServicesList-2012.pdf), specifically page 5 (**Attachment B**), the ESL indicates that "*an inside wire maintenance is eligible as a component part of telephone service only if charges are minimal.*" Because the ESL does not specifically indicate what is considered "minimal," I did not remove this cost.

I sent the ESL to the reviewer Warren Fitch and received this response (**Attachment C**):

Michon,

Per USAC inside wire maintenance minimum is considered per FRN, not by line item. Let me know if you have any questions.

No. of Copies rec'd  
List ABCDE

0

I then asked what that minimum was and got this response on 12/9/2014 (Attachment C):

Michon,

It's actually if the inside wire maintenance is minimal compared to your total FRN amount. Your FRN amount is \$7,867.92 and your total Inside wire maintenance is \$990.00 which is a little over 12% of your FRN so that would not be considered minimal. Let me know if you have any more questions.

I then asked Mr. Fitch what percentage would be acceptable and documentation from USAC showing what the overall percentage compared to the actual FRN request would be and I received no response. We feel that the charges are minimal and I asked the reviewer Warren Fitch to clarify this for us and received no response.

There is absolutely no question that charges for telephone wiring maintenance plans are eligible for funding as Priority 1 service. The only question is what the Administrator considers "minimal" charges for such a plan.

Hackley Public Library feels that the certifications made on the BEAR reimbursement form were for eligible components listed in the 2012 ESL. Thank you for your time and consideration of this appeal.

Most respectfully,

A handwritten signature in blue ink that reads "Michon Wiesen". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Michon Wiesen, Consultant  
On behalf of the Hackley Public Library

Cc: Denise Quinn-Business Manager for the Hackley Public Library

Received & Inspected

MAY 22 2015

FCC Mail Room

Re: Letter of Agency for E-rate Funding Year 2014-15

This **Letter of Agency** confirms the participation of Hackley Public Library in the federal e-rate program in partnership with Elite Fund, Inc. (George Winchell, Ginger Gurecki, Michon Wiesen, Nicki Hansen, and/or Janelle Morgan). I hereby authorize Elite Fund, Inc. (George Winchell, Ginger Gurecki, Michon Wiesen, Nicki Hansen, and/or Janelle Morgan) to act on behalf of Hackley Public Library for the 2013, 2014 and 2015 e-rate funding years with the Schools and Libraries Division of the Universal Service Administrative Company as defined and delimited within the attached Scope of Services during the 2014-2015 school fiscal year (July 1, 2014 through June 30, 2015). Elite Fund, Inc. (George Winchell, Ginger Gurecki, Michon Wiesen, Nicki Hansen, and/or Janelle Morgan) is authorized to assist the district in completing and filing the appropriate e-rate forms and in responding to USAC questions related to said applications. However, Elite Fund, Inc. (George Winchell, Ginger Gurecki, Michon Wiesen, Nicki Hansen, and/or Janelle Morgan) is not authorized to assist with the competitive bidding process or authorize (sign) applications. It is understood that **all decisions related to the submission of those applications/forms and/or in response to SLD queries shall be the responsibility of the district.**

Name of Entity: Hackley Public Library

Date: 07/01/2014

Signature: 

Name: Denise Quinn

Title: Business Manager





A  
Schools & Libraries Division

Notification of Improperly Disbursed Funds Recovery Letter  
Funding Year 2012: July 1, 2012 - June 30, 2013

January 29, 2015

Denise Quinn  
HACKLEY PUBLIC LIBRARY  
316 W WEBSTER AVE  
MUSKEGON, MI 49440 1209

Re: Form 471 Application Number: 838141  
Funding Year: 2012  
Applicant's Form Identifier: Hackley  
Billed Entity Number: 131547  
FCC Registration Number: 0012894002  
SPIN: 143004791  
SPIN Name: Frontier North, Inc.  
Service Provider Contact Person: Laine Lawson

Our routine review of Schools and Libraries Program (Program) funding commitments has revealed certain applications where funds were disbursed in violation of Program rules.

In order to be sure that no funds are used in violation of Program rules, the Universal Service Administrative Company (USAC) must now recover these improper disbursements. The purpose of this letter is to inform you of the recoveries as required by Program rules, and to give you an opportunity to appeal this decision. USAC has determined the applicant is responsible for all or some of the Program rule violations. Therefore, the applicant is responsible to repay all or some of the funds disbursed in error.

This is NOT a bill. The next step in the recovery of improperly disbursed funds process is for USAC to issue you a Demand Payment Letter. The balance of the debt will be due within 30 days of that letter. Failure to pay the debt within 30 days from the date of the Demand Payment Letter could result in interest, late payment fees, administrative charges and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see "Red Light Frequently Asked Questions (FAQs)" posted on the FCC website at [http://www.fcc.gov/debt\\_collection/faq.html](http://www.fcc.gov/debt_collection/faq.html).

Schools and Libraries Division - Correspondence Unit  
100 South Jefferson Road, P.O. Box 902, Whippany, NJ 07981  
Visit us online at: [www.usac.org/sl](http://www.usac.org/sl)

TO APPEAL THIS DECISION:

If you wish to appeal the Notification of Improperly Disbursed Funds Recovery decision indicated in this letter to USAC, your appeal must be received or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify the date of the Notification of Improperly Disbursed Funds Recovery Letter and the Funding Request Number(s) (FRNs) you are appealing. Your letter of appeal must include the
  - Billed Entity Name,
  - Form 471 Application Number,
  - Billed Entity Number, and
  - FCC Registration Number (FCC RN) from the top of your letter.
3. When explaining your appeal, copy the language or text from the Funding Disbursement Recovery Report that is the subject of your appeal to allow USAC to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal including any correspondence and documentation.
4. If you are an applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are a service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org) or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to us by fax, fax your appeal to (973) 599-6542.

To submit your appeal to us on paper, send your appeal to:

Letter of Appeal  
Schools and Libraries Division - Correspondence Unit  
30 Lanidex Plaza West  
PO Box 685  
Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the "Schools and Libraries" section of the USAC website.

# FUNDING DISBURSEMENT RECOVERY REPORT

On the pages following this letter, we have provided a Funding Disbursement Recovery Report (Report) for the form 471 application cited above. The enclosed Report includes the Funding Request Number(s) from the application for which recovery is necessary. See the "Guide to USAC Letter Reports" posted at <http://usac.org/sl/tools/reference/guide-usac-letter-reports.aspx> for more information on each of the fields in the Report. USAC is also sending this information to the service provider for informational purposes. If USAC has determined the service provider is also responsible for any rule violation on these FRN(s), a separate letter will be sent to the service provider detailing the necessary service provider action. The Report explains the exact amount the applicant is responsible for repaying.

Schools and Libraries Division  
Universal Services Administrative Company

cc:Laine Lawson  
Frontier North, Inc.

Funding Disbursement Recovery Report  
for Form 471 Application Number: 838141

Funding Request Number: 2321499  
Services Ordered: TELCOMM SERVICES  
SPIN: 143004791  
Service Provider Name: Frontier North, Inc.  
Contract Number: n/a  
Billing Account Number:  
Site Identifier: 131547  
Funding Commitment: \$6,373.42  
Funds Disbursed to Date: \$6,140.72  
Funds to be Recovered from Applicant: \$424.36

Disbursed Funds Recovery Explanation:

After multiple requests for documentation and application review, it was determined that \$424.36 in funds was improperly disbursed for the following ineligible items: Inside Wire Maintenance. The pre-discount cost associated with these items is \$471.51, respectively, for a total ineligible amount of \$471.51. At the applicants 90 percent discount rate, this resulted in an improper disbursement of \$424.36. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx> for the Eligible Services List. In this situation, the applicant made the certifications on the BEAR Form listed below indicating that the services and/or equipment provided to the applicant were eligible for funding. On the BEAR Form, the authorized person certifies that discount amounts for which reimbursement is sought represent charges for eligible services delivered to and used by eligible entities. Therefore, USAC has determined that the applicant is responsible for the rule violation. Accordingly, USAC will seek recovery of \$424.36 of improperly disbursed funds from the applicant.



Telephone Service	<p>"Telephone Service" refers to communication that takes place using the public switched telephone network. Costs to subscribe to a telephone service are generally eligible for discount, including the costs for the following telephone services:</p> <ul style="list-style-type: none"><li>• <a href="#">800 service</a>, e.g., a toll-free telephone number for students to contact school regarding questions about homework</li><li>• <a href="#">Centrex</a></li><li>• <a href="#">Local phone service</a></li><li>• <a href="#">Long distance telephone service</a></li><li>• <a href="#">Interconnected Voice Over Internet Protocol</a> (the regulatory classification of <a href="#">interconnected VoIP</a> service does not affect the inclusion of this service as an eligible service in this category)</li><li>• <a href="#">POTS</a> ("Plain Old Telephone Service")</li><li>• <a href="#">Radio loop</a></li><li>• <a href="#">Wireless telephone services</a>, e.g., <a href="#">cellular service</a> and Personal Communications Services (PCS)<ul style="list-style-type: none"><li>◦ See the Internet Access category for the eligibility of <a href="#">Wireless Internet access</a>/e-mail plans for portable electronics</li></ul></li></ul> <p>Shared telephone service (only that portion of the shared service relating to the eligible use and location may receive discounts)</p> <p>Various payment options may be used with these eligible services, and phone bills may include billing terms, such as, <a href="#">flat rate</a>, <a href="#">local measured service</a>, and <a href="#">message rate service</a>. <a href="#">Phone calling cards</a> may also be eligible, if they are used for an educational purpose.</p> <ul style="list-style-type: none"><li>• Service to an eligible location for educational or library purposes can provide voice communication, fax connections, modem connections, <a href="#">911</a> or an <a href="#">alarm</a>.</li></ul>
Telephone Service Components	<p>Telephone features indicated in this section are eligible for discount if they are a component part of a telephone service. Generally, this requirement means that these charges will appear on the same bill as the telephone service itself.</p> <ul style="list-style-type: none"><li>• <a href="#">900\976 Call blocking</a></li><li>• <a href="#">Text messaging</a></li><li>• <a href="#">Custom calling services</a></li><li>• <a href="#">Direct Inward Dialing (DID)</a></li><li>• <a href="#">Directory assistance charges</a></li><li>• An <a href="#">inside wire maintenance</a> plan is eligible as a component part of a telephone service only if charges are minimal.</li><li>• Installation charges—see the entry for "<a href="#">Installation and Configuration</a>" in the Miscellaneous section</li></ul>



**Michon Wiesen**

*Attachment C*

**From:** Fitch, Warren <Warren.FITCH@sl.universalservice.org>  
**Sent:** Tuesday, December 09, 2014 1:09 PM  
**To:** 'michon@elitefund.com'  
**Cc:** dquinn@hackleylibrary.org  
**Subject:** RE: ERate 471 App# 838141

Michon,

It's actually if the inside wire maintenance is minimal compared to your total FRN amount. Your FRN amount is \$7,867.92 and your total Inside wire maintenance is \$990.00 which is a little over 12% of your FRN so that would not be considered minimal. Let me know if you have any more questions.

Warren Fitch  
Associate Manager Program Compliance  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.5073 | F: 973.599-6582  
[wfitch@sl.universalservice.org](mailto:wfitch@sl.universalservice.org)

---

**From:** Michon Wiesen [<mailto:michon@elitefund.com>]  
**Sent:** Tuesday, December 09, 2014 9:01 AM  
**To:** Fitch, Warren  
**Cc:** [dquinn@hackleylibrary.org](mailto:dquinn@hackleylibrary.org)  
**Subject:** RE: ERate 471 App# 838141

Warren,

So what does this mean?

What is the minimum because I could not find any specifications on the ESL. I have never had an issue with Inside Wire Mait being covered.

*Michon Wiesen*

E-Rate Consultant  
Elite Fund, Inc  
CRN # 16043589  
989-283-1200 or 800-705-9703  
Fax 815-717-9761  
[Michon@elitefund.com](mailto:Michon@elitefund.com)

---

**From:** Fitch, Warren [<mailto:Warren.FITCH@sl.universalservice.org>]  
**Sent:** Friday, December 05, 2014 11:05 AM  
**To:** 'michon@elitefund.com'  
**Cc:** [dquinn@hackleylibrary.org](mailto:dquinn@hackleylibrary.org)  
**Subject:** RE: ERate 471 App# 838141

Michon,

Per USAC inside wire maintenance minimum is considered per FRN, not by line item. Let me know if you have any questions.

Warren Fitch  
Associate Manager Program Compliance  
30 Lanidex Plaza West | Parsippany, NJ 07054  
T: 973.581.5073 | F: 973.599-6582  
[wfitch@sl.universalservice.org](mailto:wfitch@sl.universalservice.org)

---

**From:** Michon Wiesen [<mailto:michon@elitefund.com>]  
**Sent:** Wednesday, December 03, 2014 10:50 AM  
**To:** Fitch, Warren  
**Cc:** [dquinn@hackleylibrary.org](mailto:dquinn@hackleylibrary.org)  
**Subject:** RE: ERate 471 App# 838141

Please use the documentation that I already sent you as our answers.

*Michon Wiesen*

E-Rate Consultant  
Elite Fund, Inc  
CRN # 16043589  
989-283-1200 or 800-705-9703  
Fax 815-717-9761  
[Michon@elitefund.com](mailto:Michon@elitefund.com)

---

**From:** Fitch, Warren [<mailto:Warren.FITCH@sl.universalservice.org>]  
**Sent:** Wednesday, December 03, 2014 10:40 AM  
**To:** 'Denise Quinn@1-231-7264724'  
**Cc:** 'dquinn@hackleylibrary.org'; [michon@elitefund.com](mailto:michon@elitefund.com)  
**Subject:** ERate 471 App# 838141

Please see the attached.

This is the corrected letter with the correct FRN's and Applicant name.



Schools and Libraries Division

**Demand Payment Letter**  
**Funding Year 2012: July 1, 2012 - June 30, 2013**

May 5, 2015

Denise Quinn  
HACKLEY PUBLIC LIBRARY  
316 W WEBSTER AVE  
MUSKEGON, MI 49440 1209

Re: Form 471 Application Number:	838141
Funding Year:	2012
Applicant's Form Identifier:	Hackley
Billed Entity Number:	131547
FCC Registration Number:	0012894002
SPIN:	143004791
Service Provider Name:	Frontier North, Inc.
Service Provider Contact Person:	Laine Lawson
Payment Due By:	06/04/2015

You were recently sent a Notification of Improperly Disbursed Funds Recovery Letter informing you of the need to recover funds from you for the Funding Request Number(s) (FRNs) listed on the Funding Disbursement Recovery Report (Report) of that letter. A copy of that Report is also attached to this letter.

The balance of this debt is due within 30 days from the date of this letter. Failure to pay the debt within 30 days from the date of this letter could result in interest, late payment fees, administrative charges, and implementation of the "Red Light Rule." The FCC's Red Light Rule requires USAC to dismiss pending FCC Form 471 applications if the entity responsible for paying the outstanding debt has not paid the debt, or otherwise made satisfactory arrangements to pay the debt within 30 days of the notice provided by USAC. For more information on the Red Light Rule, please see "Red Light Frequently Asked Questions (FAQs)" posted on the FCC website at [http://www.fcc.gov/debt\\_collection/faq.html](http://www.fcc.gov/debt_collection/faq.html).

If the Universal Service Administrative Company (USAC) has determined that both the applicant and the service provider are responsible for a Program rule violation, then, pursuant to the Order on Reconsideration and Fourth Report and Order (FCC 04-181), the USAC will seek recovery of the improperly disbursed amount from BOTH parties and will continue to seek recovery until either or both parties have fully paid the debt. If USAC has determined that both the applicant and the service provider are responsible for a Program rule violation, this was indicated in the Disbursed Funds Recovery Explanation on the Funding Disbursement Recovery Report.

If USAC is attempting to collect all or part of the debt from both the applicant and the service provider, then you should work with your service provider to determine who will be repaying the debt to avoid duplicate payment.

Schools and Libraries Division - Correspondence Unit  
30 Landmark Plaza West, PO Box 685, Parsippany, NJ 07054-0685  
Visit us online at: [www.usac.org/sd](http://www.usac.org/sd)



Funding Disbursement Recovery Report  
Form 471 Application Number: 838141

Funding Request Number: 2321499  
Services Ordered: TELCOMM SERVICES  
SPIN: 143004791  
Service Provider Name: Frontier North, Inc.  
Contract Number: n/a  
Billing Account Number:  
Site Identifier: 131547  
Funding Commitment: \$6,373.42  
Funds Disbursed to Date: \$6,140.72  
Funds to be Recovered from Applicant: \$424.36  
Disbursed Funds Recovery Explanation:

After multiple requests for documentation and application review, it was determined that \$424.36 in funds was improperly disbursed for the following ineligible items: Inside Wire Maintenance. The pre-discount cost associated with these items is \$471.51, respectively, for a total ineligible amount of \$471.51. At the applicants 90 percent discount rate, this resulted in an improper disbursement of \$424.36. FCC rules provide that funding may be approved only for eligible products and/or services. The USAC web site contains a list of eligible products and/or services. See the web site, <http://www.usac.org/sl/applicants/beforeyoubegin/eligible-services-list.aspx> for the Eligible Services List. In this situation, the applicant made the certifications on the BEAR Form listed below indicating that the services and/or equipment provided to the applicant were eligible for funding. On the BEAR Form, the authorized person certifies that discount amounts for which reimbursement is sought represent charges for eligible services delivered to and used by eligible entities. Therefore, USAC has determined that the applicant is responsible for the rule violation. Accordingly, USAC will seek recovery of \$424.36 of improperly disbursed funds from the applicant.

PLEASE SEND A COPY OF THIS PAGE WITH YOUR  
CHECK TO ENSURE TIMELY PROCESSING

Please note, however, that the debt is the responsibility of both the applicant and service provider. Therefore, you are responsible for ensuring that the debt is paid in a timely manner.

Please remit payment for the full "Funds to be Recovered from Applicant" amount shown in the Report. To ensure that your payment is properly credited, please include a copy of the Report with your check. Make your check payable to the Universal Service Administrative Company (USAC).

If sending payment by U. S. Postal Service or major courier service (e.g. Airborne, FedEx, and UPS) please send check payments to:

Universal Service Administrative Company  
Lock Box 105056  
1075 Loop Road  
Atlanta, GA 30337  
Phone: 404-209-6377

Local messenger service should deliver to the Lockbox Receiving Window at the above address.

Payment is due within 30 days from the date of this letter.

Complete Program information is posted to the SLD section of the USAC website at [www.usac.org/sl/](http://www.usac.org/sl/). You may also contact the SLD Client Service Bureau by email using the "Submit a Question" link on the SLD website, by fax at 1-888-276-8736 or by phone at 1-888-203-8100.

Universal Service Administrative Company  
Schools and Libraries Division

cc: Laine Lawson  
Frontier North, Inc.



Universal Service Administrative Company  
Schools & Libraries Division

---

Administrator's Decision on Appeal – Funding Year 2012-2013

April 27, 2015

Denise Quinn  
Hackley Public Library  
316 W Webster Street  
Muskegon, MI 49440

Re: Applicant Name: HACKLEY PUBLIC LIBRARY  
Billed Entity Number: 131547  
Form 471 Application Number: 838141  
Funding Request Number(s): 2321499  
Your Correspondence Dated: February 02, 2015

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2012 Notification of Improperly Disbursed Funds Recovery Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2321499  
Decision on Appeal: **Denied**  
Explanation:

- Per Eligible Services List for Funding Year 2012 an inside wire maintenance plan is eligible as a component part of a telephone service only if charges are minimal. The Inside Wire Maintenance request at a cost of \$82.50 per month **is not considered minimal**. As a result USAC determined that the Inside Wire Maintenance request is eligible as a Basic Maintenance of Internal Connections service.

Hackley Public Library (the Library) cited FCC Form 470 application number 397880001006780 on Block 5, Item 12 of the FCC Form 471. The service category of Basic Maintenance of Internal Connections was not posted for on the referenced FCC Form 470. This is a violation of the competitive bidding rules



because the services requested on the FCC Form 471 application must be posted for on the FCC Form 470 in order for service providers to formulate accurate bids for the desired service. During the appeal review the Library was given the opportunity to cite an alternate FCC Form 470 establishing the bidding for the services requested on their FCC Form 471 in order to cure the competitive bidding violation. In an e-mail submitted on 4/10/2015, Michon Wiesen, Hackley Public Library's consultant stated that the FCC Form 470 establishing the bidding requirement for the requested services is FCC Form 470 application number 397880001006780. As this information is the same as the original input, the competitive bidding violation has not been cured. On appeal, you have failed to provide evidence that the Library has complied with this support mechanism competitive bidding requirements, or that USAC has erred in its initial decision. Consequently, USAC denies the appeal.

- FCC rules require that all products and services for which an applicant requests discounts on an FCC Form 471 must be competitively bid on an FCC Form 470. The FCC Form 470 must include a complete description of the services for which discounts are sought, be posted on the website for 28 days, and applicants must carefully consider all bids received before selecting a vendor, entering into an agreement or signing a contract, and signing and submitting an FCC Form 471. *See* 47 C.F.R. secs. 54.503(b) and (c), 54.511(a) and (c). These competitive bidding requirements help to ensure that applicants receive the lowest pre-discount price from vendors. *See* Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Order on Reconsideration, 12 FCC Rcd 10095, 10098, FCC 97-246 para. 9 (rel. Jul. 10, 1997). The only exceptions to the posting requirement are for: (1) contracts signed on or before July 10, 1997 for the life of the contract; and (2) contracts signed between July 10, 1997 and before January 30, 1998 (the date on which the website became operational) for products and/or services provided under such contract between January 1, 1998 and December 31, 1998. *See* 47 C.F.R. secs. 54.511(c).

Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company